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KEYPOINT GOVERNMENT SOLUTIONS, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DONALD LOUNIBOS, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

KEYPOINT GOVERNMENT  
SOLUTIONS, INC., a Delaware  
Corporation, and Does 1-10, inclusive,

Defendants.

Case No. 12-CV-0636 (EMC)

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING ADR DEADLINE**

1 The parties hereby stipulate as follows:

2 WHEREAS, the instant matter was referred to panel mediation through the ADR Department of  
3 the Northern District of California. The parties were assigned to mediate this matter with the Honorable  
4 David A. Garcia (Ret.) through JAMS in San Francisco, California. To this end, the parties' previously  
5 requested a continued deadline to complete mediation by September 15, 2012. (Dkt No. 17);

6 WHEREAS, the parties are engaged in preliminary discovery in advance of the mediation, but as  
7 a result of scheduling conflicts, the parties will not be able to complete the necessary depositions prior  
8 to the current ADR deadline;

9 WHEREAS, the parties have continued their mediation with Judge Garcia to September 26,  
10 2012;

11 WHEREAS, the parties respectfully request that the Court grant a 30-day continuance of the  
12 parties' mediation deadline. The next Case Management Conference is scheduled for October 26, 2012,  
13 and thus the parties' do not anticipate that a further continuance of the ADR deadline will impact the  
14 current case schedule;

15 IT IS THEREFORE STIPULATED AND AGREED that the parties shall complete mediation on  
16 or before October 15, 2012.

17  
18 **IT IS SO STIPULATED.**

19  
20 DATED: August 15, 2012

NORTH BAY LAW GROUP

21 /s/ David S. Harris

22 David S. Harris  
23 Attorney For Plaintiff  
DONALD LOUNIBOS

24 DATED: August 15, 2012

LITTLER MENDELSON

25 /s/ Karin M. Cogbill

26 Karin M. Cogbill  
27 Attorneys for Defendant  
28 KEYPOINT GOVERNMENT SOLUTIONS,  
INC.

**IT IS HEREBY ORDERED AS FOLLOWS:**

The parties shall complete mediation on or before October 15, 2012.

DATED: August <sup>16</sup>\_\_\_\_, 2012

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